

ANTI-CORRUPTION POLICY OF THE ORLEN CAPITAL GROUP

OUR VISION

The ORLEN Capital Group operates in compliance according to the highest ethical standards

OUR GOAL

Providing honest and transparent model of conducting business activity of the ORLEN Capital Group guaranteeing trust, security, free competition and value for all stakeholders of the ORLEN Capital Group

OUR COMMITMENTS

As part of our daily responsibilities, we act in accordance with the values and standards of conduct of the ORLEN Capital Group

We do not tolerate corrupt behaviour involving the abuse of positions or functions to achieve undue financial or personal benefits

We actively build and verify awareness of ethical attitudes and risks of corruption among our staff members and contracting parties

The ORLEN Capital Group Management representatives are obliged to create a work environment based on respect for ethical standards and compliance with applicable regulations

We avoid conflicts of interest that may undermine our integrity and credibility.

We comply with internal regulations of the ORLEN Capital Group regarding expenses and gifts

We identify and manage the risks of fraud and corruption risk responsibly and consciously

We report and clarify cases of breaches of laws and internal regulations regarding counteracting corruption and immediately take appropriate disciplinary and corrective actions

We comply with the provisions of anti-corruption regulations in all places where our business is carried out

The anti-corruption policy in the ORLEN Capital Group was implemented by a decree issued by the President of the Management Board of PKN ORLEN S.A. the 14th of November 2018.

- Corruption crime hinders economic development, violates free competition, increases the cost of running business, reduces the safety and quality of products and services, which may threaten the interests and destroy the image of every entity participating in business trading.
- Corruption and other embezzlement related to it involve criminal liability for those who engage in such practices and the consequences for the company itself. The acceptance of corrupt activities makes it difficult to conduct business activities, limits the possibility of promoting services and products, may prevent the acquisition of public procurement as well as threatens with high financial penalties.
- The ORLEN Capital Group's anti-corruption policy reflects international best practices in preventing, detecting and responding to the phenomenon of bribery, identifying corruption related, technological, financial and reputational risk as well as other corrupt behaviours which may harm the economic interests of the ORLEN Capital Group.
- Effective counteraction the phenomenon of corruption requires the implementation of system solutions, based on the analysis of information available within the organization and obtained from external sources.
- Anti-corruption solutions protect against corrupt acts, defined by law, moreover counteract mismanagement, improperly managed conflict of interest or collusion of contractors in the event of their connection with corruption.
- Implementation of the ORLEN Capital Group's Anti-Corruption Policy enhances security in relations with business partners and strengthens communication within the organization.
- The Anti-corruption policy is a formal basis for implementation of the Anti-Corruption System in the ORLEN Capital Group which regulates the relationship among staff members, entities and persons representing the ORLEN Capital Group companies, contracting parties, suppliers, clients and representatives of public administration bodies.
- The Anti-Corruption System is a set of measures, forms and methods of counteracting and detecting corruption and related frauds implemented in the ORLEN Capital Group companies and managed centrally by PKN ORLEN S.A. Control and Safety Office.
- The Policy aims, in particular, at:
 - 1) counteracting and detection of corruption related events by implementing system solutions.
 - 2) identifying threats, assessing risks and undertaking actions to protect economic interests of the ORLEN Capital Group companies;
 - 3) initiating control or auditing activities to assess events and determine liability of persons suspected of corruption, including employees and the ORLEN Capital Group representatives who neglect implementation and application of anti-corruption standards;

- 4) implementing the code of conduct of employees and representatives of the ORLEN Capital Group companies enhancing anti-corruption safety and security, including counteracting fraud, the basis of which may indicate corruption.
 - 5) shaping the awareness of people making business decisions, in the scope of identifying and preventing corruption behaviours.
- The company's policy assumes that all employees and representatives of the ORLEN Capital Group companies shall comply with the anti-corruption regulations introduced in all countries in which ORLEN Capital Group companies operate.
 - The company's policy obliges all employees and representatives of the ORLEN Capital Group companies to comply with the principles of ethics, integrity and conduct in accordance with applicable law in all activities undertaken, in particular in business transactions related to natural persons, business partners, public institutions and social organizations.
 - Employees and representatives of the ORLEN Capital Group companies are prohibited from performing such acts as:

Venality

Employees and representatives may not, in connection with the activities carried out for the benefit of the ORLEN Capital Group companies, accept asset or personal advantages or their promise, including conduct constituting violation of the law neither make the performance conditional on receipt of asset or personal benefit.

Bribery

Employees and representatives may not grant a material or personal benefit to any person holding a public office, in connection with performance of this function. Staff members and representatives may not take any actions aimed at persuading a public official to violate the law or providing or promising to give such a person financial or personal benefits for violating the law.

Trading in influence – passive influence peddling

Employees and representatives may not, relying on their influence or position in the ORLEN Capital Group companies, or by convincing another person or reassuring him/her of the existence of such influence, undertake the mediation in settling the matter in exchange for the assets and personal advantage, or its promise.

Trading in influence – active influence peddling

Employees and representatives may not grant or promise financial or personal advantage in exchange for brokerage in a State, local government, international or national organization or in a foreign organizational unit with public funds, consisting failure to act by a person holding a public function in connection with the performance of this function.

Managers' bribery

Staff members and representatives cannot demand or accept a material or personal benefit or the promise of such in return for abuse of their rights or

failure to fulfil their duty which could cause the ORLEN Capital Group company, in which they are employed, property damage or act of unfair competition or an unacceptable preferential activity for the benefit of the buyer or recipient of the good, service or supply services.

Manipulations in tenders

Employees and representatives may not, in order to obtain financial gain, prevent or hinder the tender or enter into an agreement with another person acting to the detriment of the owner of the property, or a person or institution for whom the tender is being made.

Employees and representatives may not, in connection with a tender, disseminate information or conceal significant circumstances relevant to the conclusion of the contract being the subject of the tender or enter into an agreement with another person acting to the detriment of the owner of the property or the person or institution for whom the tender is being made.

- The company's policy introduces in the ORLEN Capital Group companies and the obligation to create conditions for anonymous reporting of irregularities and the rules for accepting and handling out gifts in connection with business activities of employees and representatives.
- The ORLEN Group companies train their employees and representatives in the field of counteracting corruption and responding to corruption-related situations.
- The Control and Security Office of PKN ORLEN S.A. is in charge of implementation and implementation of the Anti-Corruption Policy in PKN ORLEN S.A.